# IN THE DRAWINGS:

The attached drawing includes changes to FIG. 9. The sheet containing FIG. 9 replaces the original sheet including FIG. 9. In FIG. 9, "CONNECTION CHEKER" has been amended to recite ---CONNECTION CHECKER--- to correct the spelling of same. No new matter has been added. Approval of this change to the Drawings is respectfully requested.

## **REMARKS**

#### INTRODUCTION:

In accordance with the foregoing, claim 20 has been canceled without prejudice or disclaimer, and claims 1, 2, 4, 6, 7, 8, 12, 13, 14, 16, 19 and 21 have been amended. No new matter is being presented, and approval and entry are respectfully requested.

Claims 1-19 and 21 are pending and under consideration. Reconsideration is respectfully requested.

#### THE DRAWINGS:

In reviewing the drawings, a spelling error was noted in FIG. 9. The correction to FIG. 9 changing "CONNECTION CHEKER" to recite ---CONNECTION CHECKER--- has been requested and a replacement figure has been submitted herewith. Therefore, FIG. 9 is now submitted to be in correct form.

## **REJECTION UNDER 35 U.S.C. §103:**

**A.** In the Office Action, at pages 2-11, numbered paragraph I, claims 1-6, 8-14, and 16-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sekikawa (USPN 6,498,658; hereafter, Sekikawa). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

Independent claim 1 has been amended to clarify that the method utilizes a <u>display-free</u> image printing unit and that the operation of checking for or generating compressed image data is checking for or generating compressed image data from the external memory card.

Independent claim 13 has been amended to clarify that the method utilizes a <u>display-free</u> image printing unit.

Independent claim 19 has been amended to clarify that the computer system utilizes a <u>display-free</u> image printing unit and to include the features of claim 20. Claim 20 has been canceled without prejudice or disclaimer.

The Examiner has admitted that Sekikawa "does not explicitly disclose 'printing at the image printing unit the displayed image data in response to a user print request at the image printing unit."

It is respectfully submitted that Sekikawa teaches utilizing an LCD with a fitted touch panel for performing a display of various settings and various states (see, e.g., Sekikawa, col. 5, lines 54-56 and FIGs. 8-12). As pointed out in paragraph [0004] of the specification of the

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present application, such an LCD is expensive, and the present invention avoids the necessity of such an LCD. Independent claims 1, 13, and 19 of the present invention have been amended to show more clearly that the image printing unit of the present invention is a display-free image printing unit, which is not taught or suggested by Sekikawa. Independent claim 19 has been further amended to show more clearly that the programmed processor further detects insertion of a memory card with the image data into the display-free image printing unit and detects connection of the display-free image printing unit to a personal computer, transmits image data read from the memory card comprising a generated image number to the personal computer, transmits a user selected image number to the personal computer to display the image data corresponding to the user selected image number, and prints the displayed image data corresponding to the user selected image number in response to a user print request at the display-free image printing unit, which is not taught or suggested by Sekikawa.

Thus, it is respectfully submitted that amended independent claims 1, 13 and 19 of the present invention are patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658). Since claims 2-6, 8-12,14, and 16-18 depend from amended independent claims 1 and 13, respectively, claims 2-6, 8-12,14, and 16-18 are patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) for at least the reasons amended independent claims 1, 13 and 19 are patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658).

**B.** In the Office Action, at pages 11-12, numbered paragraph II, claim 7 was rejected under 35 U.S.C. §103(a) as being unpatentable over Sekikawa (USPN 6,498,658; hereafter, Sekikawa) in view of Bubie et al. (USPN 6,453,078; hereafter, Bubie). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

The Examiner has admitted that Sekikawa "does not explicitly disclose 'wherein the reading of the image data comprises: ignoring the image number provided form the image printing unit as a last image number, if a previous image data is being displayed; and reading the image data corresponding to the last image number after the previous image data is completely displayed."

Bubie teaches a digital camera 12 that is coupled to a host computer 14, wherein a removable memory card is inserted into the host computer, and the host computer displays the images on a display monitor of the host computer and sends images to a local printer 18 to be printed. That is, Bubie does not teach or suggest a method, computer system or display-free image print unit wherein a memory card is inserted into an image printing unit which is coupled to a computer, as is illustrated in FIG. 2 of the present invention.

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Thus, even if combined, Sekikawa and Bubie do not teach or suggest amended independent claim 1 of the present invention. Hence, it is respectfully submitted that amended independent claim 1 of the present invention is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Bubie et al. (USPN 6,453,078), alone or in combination. Since claim 7 depends from amended independent claim 1, claim 7 is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Bubie et al. (USPN 6,453,078), alone or in combination, for at least the reasons amended independent claim 1 is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Bubie et al. (USPN 6,453,078), alone or in combination.

C. In the Office Action, at pages 12-14, numbered paragraph III, claim 15 was rejected under 35 U.S.C. §103(a) as being unpatentable over Sekikawa (USPN 6,498,658; hereafter, Sekikawa) in view of Official Notice. The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

The Examiner has admitted that Sekikawa "does not explicitly disclose 'a format converter converting an RGB format of the image data read from the memory card into a CMYK format and outputting the image data having the CMYK format to the printing section," and submits that RBG and CMYK are well-known in the art of printing.

However, as noted above, Sekikawa teaches utilizing an LCD with a fitted touch panel for performing a display of various settings and various states (see, e.g., Sekikawa, col. 5, lines 54-56 and FIGs. 8-12). As pointed out in paragraph [0004] of the specification of the present application, such an LCD is expensive, and the present invention avoids the necessity of such an LCD. Independent claim 13 of the present invention has been amended to show more clearly that the image printing unit of the present invention is a display-free image printing unit, which is not taught or suggested by Sekikawa.

Thus, it is respectfully submitted that amended independent claim 13 is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Official Notice. Since claim 15 depends from amended independent claim 13, claim 15 is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Official Notice for at least the reasons amended independent claim 13 is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Official Notice.

**D.** In the Office Action, at page 14, numbered paragraph IV, claim 21 was rejected under 35 U.S.C. §103(a) as being unpatentable over Sekikawa (USPN 6,498,658; hereafter, Sekikawa) in view of Ito et al. (USPN 6,937,356; hereafter, Ito). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

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The Examiner has admitted that Sekikawa "does not explicitly disclose 'wherein the programmed processor remotely controls the image data display size and position."

Amended independent claim 19 discloses a display-free image printing unit, comprising: a programmed processor controlling remote image data display and manipulation and printing locally the remotely displayed image data, wherein the programmed processor further detects insertion of a memory card with the image data into the display-free image printing unit and detects connection of the display-free image printing unit to a personal computer, transmits image data read from the memory card comprising a generated image number to the personal computer, transmits a user selected image number to the personal computer to display the image data corresponding to the user selected image number, and prints the displayed image data corresponding to the user selected image number in response to a user print request at the display-free image printing unit, which is not taught or suggested by Sekikawa. That is, the display-free image printing unit of the present invention controls remote image data display and manipulation and printing locally the remotely displayed image data. In contrast, Ito teaches a digital camera that displays a picture, wherein user displays a picture on a liquid crystal display of the digital camera and specifies the picture to be printed on the memory card. When the memory card is inserted into the printer, the printer executes printing of the desired picture in accordance with the specified picture on the memory card. Hence, Ito teaches away from amended independent claim 19 of the present invention.

Thus, even if combined Sekikawa and Ito do not teach or suggest amended claim 19 of the present invention.

Hence, it is respectfully submitted that amended independent claim 19 of the present invention is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Ito et al. (USPN 6,937,356), alone or in combination.

Since claim 21 depends from amended independent claim 19, claim 21 is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Ito et al. (USPN 6,937,356), alone or in combination, for at least the reasons amended independent claim 19 is patentable under 35 U.S.C. §103(a) over Sekikawa (USPN 6,498,658) in view of Ito et al. (USPN 6,937,356), alone or in combination.

### **CONCLUSION:**

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot, and further, that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.

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If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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